

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	CRIMINAL NO. <u>19-</u>
<b>v.</b>	<b>:</b>	DATE: _____
<b>ANGELINE MOMBRUN-RAUCH</b> a/k/a Angeline Mombrun	<b>:</b>	<b>VIOLATIONS:</b> 18 U.S.C. § 1343 (wire fraud – 2 counts)

**INFORMATION**

**COUNT ONE**

At all times material to this Information:

1. Defendant ANGELINE MOMBRUN-RAUCH was an employee of the University of Pennsylvania and Penn Medicine as an administrator in the Department of Anesthesiology & Critical Care.
2. Defendant ANGELINE MOMBRUN-RAUCH's duties as an administrator included scheduling work hours and shifts for contract nurses with the University of Pennsylvania Health System (UPHS), as well as handling payroll, payroll investigations and other non-clinical work. Accordingly, defendant MOMBRUN-RAUCH had access to PennChart, which provided her access to co-workers' charts and some patient and medical records. MOMBRUN-RAUCH's duties also included the processing of certain employee terminations within Penn Medicine's Human Resources systems.

**THE SCHEME**

3. Beginning in or around June 2018 and continuing through in or about September 2018, within the Eastern District of Pennsylvania and elsewhere, defendant

**ANGELINE MOMBRUN-RAUCH**

devised and intended to devise a scheme to defraud and to obtain money and property by means of false and fraudulent pretenses, representations, and promises.

**MANNER AND MEANS**

It was part of the scheme that:

4. On or about June 5, 2018, defendant ANGELINE MOMBRUN-RAUCH sent an email communication to Certified Registered Nurse Anesthetist (CRNA) "E.L.," informing E.L. that E.L. was terminated from the UPHS as a contract employee.

5. Rather than ensure E.L.'s termination was properly processed through the UPHS Human Resources (HR) system on June 5, 2018, defendant ANGELINE MOMBRUN-RAUCH falsely and intentionally extended E.L.'s termination date and maintained E.L.'s HR employee profile as active.

6. Defendant ANGELINE MOMBRUN-RAUCH, using E.L.'s credentials, accessed E.L.'s employee profile and falsely populated phantom work hours, which generated wages for E.L. While in the Canary Islands, Spain, defendant MOMBRUN-RAUCH telephonically contacted the UPHS helpdesk, impersonated E.L. and caused E.L.'s credentials to be reset to permit defendant MOMBRUN-RAUCH to continue to access E.L.'s profile. In addition, using the Penn Medicine Self Service system, defendant MOMBRUN-RAUCH caused E.L.'s home address to be changed to defendant MOMBRUN-RAUCH's address.

7. As a result of defendant ANGELINE MOMBRUN-RAUCH's actions, defendant MOMBRUN-RAUCH caused the UPHS to issue false wages in E.L.'s name and the Automated Clearing House (ACH) Network to deposit the wages directly and electronically into

an online Meta Bank account in E.L.'s name that defendant MOMBRUN-RAUCH created to receive the ill-gotten gains.

8. Between June 5, 2018, and September 19, 2018, defendant ANGELINE MOMBRUN-RAUCH caused the UPHS to deposit wrongly approximately \$8,579 into her online bank account, and wrongly caused UPHS to issue three manual checks in E.L.'s name in the total approximate amount of \$19,356 to be sent to defendant MOMBRUN-RAUCH's residence.


9. On or about each of the following dates, in the Eastern District of Pennsylvania and elsewhere, defendant

**ANGELINE MOMBRUN-RAUCH,**

for the purpose of executing the scheme described above, and attempting to do so, caused to be transmitted by means of wire communication in interstate commerce the signals and sounds described below, each transmission constituting a separate count:

COUNT	DATE	ORIGIN OF WIRE	DESTINATION OF WIRE	METHOD OF WIRE AND DESCRIPTION
1	August 15, 2018	Texas	Pennsylvania	ACH deposit of approximately \$3,438.00 from UPHS into account ending in 8882 at Meta Bank.
2	August 30, 2018	Texas	Pennsylvania	ACH deposit of approximately \$5,141.25 from UPHS into account ending in 8882 at Meta Bank.

All in violation of Title 18, United States Code, Section 1343.

  
 for **WILLIAM M. McSWAIN**  
*United States Attorney*